

The comments below were filed before the deadline but had to be filed again to conform to FCC filing guidelines.

It appears that the FCC is attempting to come to a decision regarding the transfer of responsibility for IP and Video Relay Service from NECA to the individual states. The issues of cost for IP Relay service and the issue of fraud on IP calls (which is real and growing) are among the concerns the states have. In addition, there is the problem of IP Relay calls for 911. While IP 911 calls should not be made, when they are, they cannot be satisfactorily completed since there is no originating telephone number. This is also true for the growing number of Relay calls to 311, 211 and 511. These problems are of concern to the states if they are given IP Relay responsibility.

The problems can easily be solved. - - - IP Relay got its start as a new form of Relay service several years ago before the advent of IP Telephony service. Since IP telephony is now available to the general public via VOIP, an IP Relay call made over VOIP would allow for the routing of 911, 211, 311 and 511. VOIP initiated IP Relay would also permit a deaf user to both make and receive calls via their computer eliminating the need for a standard TTY and a standard telephone line, if they choose.

Funding in many states is restricted for Relay Service and the solution using VOIP will keep cost to the phone companies down. With an FCC order placing IP Relay control with the states using VOIP, with all the IP qualified national providers to choose from, costs will continue to come down and the public will have choices in their providers and a service free from the current fraud problems.

If you want to discuss this further, I can be reached at 518-583-1000. As a consultant to local and long distance carriers I have 38 years of experience in telephony, 25 years in 911 and 15 years with Relay. I will be happy to assist you in answering any questions you may have.

A similar solution may be available to VRS service.